

IN THE  
SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 1964

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No. 650

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INTERNATIONAL UNION, UNITED AUTOMOBILE,  
AEROSPACE, AND AGRICULTURAL IMPLEMENT  
WORKERS OF AMERICA, AFL-CIO (LOCAL 283),  
*Petitioner,*

*v.*

RUSSELL SCOFIELD, LAWRENCE HANSEN, EMIL  
STEFANIC, GEORGE KOZBIEL, AND THE NA-  
TIONAL LABOR RELATIONS BOARD, *Respondents.*

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**PETITIONER'S REPLY MEMORANDUM**

This memorandum is submitted to clarify a technical point raised in the Opposition. The individual respondents assert (Opposition, p. 4) that the union which is petitioning this Court differs in some way from its Local 283 which was the named respondent before the Labor Board. Actually, in the court below the petitioning union was interchangeably denominated with and without "Local 283" (see Petition, pp. 15, 22, 23). The original application for intervention in the Seventh Circuit omitted the name of the Local, but it expressly sought intervention for "respondent in the proceeding below". The Petition for Reconsideration below, and the order denying it, include "(Local 283)" in designating the petitioning union.

In this Court, of course, it is the intention—as mani-

fested by the Question Presented and the argument of our Petition—to seek review on behalf of the respondent before the Board (Local 283), from the denial of leave to intervene in the appellate proceedings. But to resolve any conceivable ambiguity concerning the identity of the petitioner based on the caption, after consultation with the Clerk of this Court, the caption was amended to include the designation “(Local 283)”. This should make assurance doubly sure that review is sought in this Court by the party which was the respondent before the Labor Board and which was denied intervention in the court below.

For the reasons set forth in our Petition and the support thereof set forth in the Memorandum for the National Labor Relations Board, the writ should be granted.

Respectfully submitted,

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